

ORIGINAL

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

MAILING ONLINE SERVICE

Docket No. MC98-1

SECOND INTERROGATORIES OF  
MAIL ADVERTISING SERVICE ASSOCIATION INTERNATIONAL  
TO USPS WITNESS GARVEY  
(USPS-T1-12-15)

In accordance with Order No. 1216 of the Postal Rate Commission, the witness is requested to provide written responses to the following interrogatories within 10 days of the date hereof. For purposes of these interrogatories, "MOL" refers to the Mailing Online Service that is the subject of these proceedings.

MASA/USPS-T1-12.

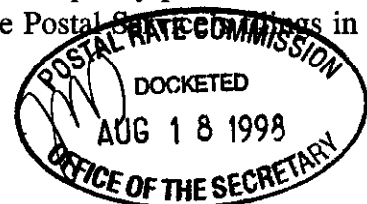
a. Referring to your Response to POIR-1-2, do any of the three categories of service providers you refer to

(i) batch the files of different customers before presenting hard copy mailing pieces to the Postal Service;

(ii) enter a customer's nationwide mailing at a Postal facility in close geographical proximity to the addressee?

b. Explain how a private business could replicate the batching and distributed entry features of MOL at a cost that is competitive with that proposed to be charged by the Postal Service for MOL. If you are aware of any private business that currently has or is developing such a capability, identify it and explain the basis for your understanding.

MASA/USPS-T1-13. Referring to your response to OCA/USPS-4(e), have the costs associated with the Postal Service's efforts to "monitor and ensure the quality performance in all aspects of Mailing Online service" been estimated as part of the Postal Service's efforts in



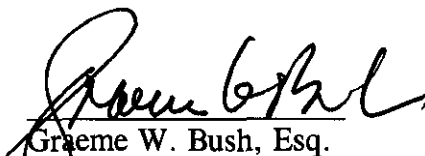
support of the Request. If so, identify the testimony and/or exhibit(s) that contain such costs. If not, explain fully why not and provide your best estimate of such costs.

MASA/USPS-T1-14. You have indicated that there are 75 possible categories of batches for each page count combination of pieces using MOL (see OCA/USPS-T5-17(a)[sic!]). Referring to your response to MASA/USPS-T5-10(b) (redirected from witness Plunkett), where you state that "large volumes of locally destinating mail will flow through the MOL system and allow high densities and levels of sort beyond those required for the requested basic automation rate,"

a. Will all 75 batch categories be capable of being entered at a Postal facility by the contract printer in one mailing? If not, explain how many of the different batch categories could be presented in one mailing, and estimate the percentage of MOL mail volume that will be attributable to each grouping.

MASA/USPS-T1-15. Referring to your response to POIR-1-1, confirm that if experience demonstrated that MOL pieces are in sufficient volume and density to qualify for a lower rate than the Basic Automation rate proposed in the Request, the Postal Service would be likely to request a decision from the PRC recommending that MOL users be charged a lower postage rate.

Respectfully submitted,

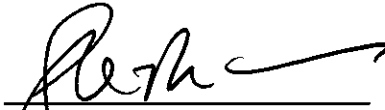


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Association International

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing interrogatories were served in accordance with Rule 12 of the Rules of Practice this 18th day of August 1998.

  
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Graeme W. Bush